

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

IN RE:

RON BALDEO
SHARON BALDEO
DEBTORS

LITTON LOAN SERVICING, LP
MOVANT

VS

RON BALDEO
SHARON BALDEO

AND MICHAEL J. MACCO, TRUSTEE
RESPONDENTS

§
§ CASE NO. 809-75481-REG
§
§ CHAPTER 13
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RELIEF FROM STAY – REAL ESTATE AND
COOPERATIVE APARTMENTS

BACKGROUND INFORMATION

1. ADDRESS OF REAL PROPERTY OR COOPERATIVE APARTMENT: 164 West Market St. Long Beach, New York 11561
2. LENDER NAME: Litton Loan Servicing, LP, as servicing agent for Deutsche Bank National Trust Company as Trustee for Fremont Home Loan Trust 2004-4 Asset Backed-Certificates, Series 2004-4
3. MORTGAGE DATE: 9/1/2004
4. POST-PETITION PAYMENT ADDRESS: P.O. BOX 4387 Houston, Texas 77210-4387

DEBT AND VALUE REPRESENTATIONS

5. TOTAL PRE-PETITION AND POST-PETITION INDEBTEDNESS OF DEBTOR (S) TO MOVANT AS OF THE MOTION FILING DATE: \$477,070.61
(THIS MAY NOT BE RELIED UPON AS A "PAYOFF" QUOTATION.)
6. MOVANT'S ESTIMATED MARKET VALUE OF THE REAL PROPERTY OR COOPERATIVE APARTMENT AS OF THE MOTION FILING DATE: \$370,000.00
7. SOURCE OF ESTIMATED MARKET VALUE: Debtor's Schedules

STATUS OF THE DEBT AS OF THE PETITION DATE

8. DEBTOR(S)'S INDEBTEDNESS TO MOVANT AS OF THE PETITION DATE:

A. TOTAL:	<u>\$468,588.80</u>
B. AMOUNT OF PRINCIPAL:	<u>\$428,654.52</u>
C. AMOUNT OF INTEREST:	<u>\$25,638.90</u>
D. AMOUNT OF ESCROW (TAXES AND INSURANCE):	<u>\$10,191.25</u>
E. FORCED PLACED INSURANCE EXPENDED BY MOVANT:	<u>\$0.00</u>
F. PRE-PETITION ATTORNEYS' FEES CHARGED TO DEBTOR(S):	<u>\$1,449.50</u>
G. PRE-PETITION LATE FEES, CHARGED TO DEBTOR(S)	<u>\$2,014.18</u>

9. CONTRACT INTEREST RATE: 7.25%

IF THE INTEREST RATE HAS CHANGED, LIST THE RATE(S) AND DATES (S) THAT EACH RATE WAS IN EFFECT:

April 2007 through March 2008 - 6.25%

April 2008 through current - 7.25%

10. OTHER PRE-PETITION FEES, CHARGES OR AMOUNTS CHARGED TO THE DEBTOR (S)'S ACCOUNT AND NOT LISTED ABOVE:

Pre-Petition Inspection Fees: \$40.00

Pre-Petition Appraisal Fees: \$100.00

Pre-Petition Modification Expenses: \$500.45

AMOUNT OF POST-PETITION DEFAULT AS OF THE MOTION FILING DATE

11. DATE OF RECEIPT OF LAST PAYMENT: 9/08/2009

12. NUMBER OF PAYMENTS DUE FROM PETITION DATE TO MOTION FILING DATE : 5 PAYMENTS.

13. PLEASE LIST ALL POST-PETITION PAYMENTS ALLEGED TO BE IN DEFAULT:

PAYMENT DUE DATE	AMOUNT DUE	AMOUNT RECEIVED	LATE FEE CHARGED
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8/1/2009	\$4,032.45	\$0.00	\$183.20
9/1/2009	\$4,032.45	\$0.00	\$183.20
10/1/2009	\$4,032.45	\$0.00	\$183.20
11/1/2009	\$4,032.45	\$0.00	\$183.20
12/1/2009	\$4,032.45	\$0.00	

14. OTHER POST-PETITION FEES CHARGED TO DEBTOR(S)

A. ATTORNEYS' FEES IN CONNECTION WITH THIS MOTION: \$300.00

B. FILING FEE IN CONNECTION WITH THIS MOTION: \$150.00

C. OTHER POST-PETITION ATTORNEYS' FEES: \$379.50

D. POST-PETITION INSPECTION FEES: \$9.00

E. POST-PETITION APPRAISAL/BROKER'S PRICE OPINION FEES: \$95.00

F. FORCED PLACED INSURANCE EXPENDED BY MOVANT: \$0.00

15. AMOUNT HELD IN SUSPENSE BY MOVANT: \$0.53

16. OTHER POST-PETITION FEES, CHARGES OR AMOUNTS CHARGED TO DEBTOR(S)'S ACCOUNT AND NOT LISTED ABOVE: N/A

REQUIRED ATTACHMENTS TO MOTION

PLEASE ATTACH THE FOLLOWING DOCUMENTS TO THIS MOTION AND INDICATE THE EXHIBIT NUMBER ASSOCIATED WITH EACH DOCUMENT.

- (1) COPIES OF DOCUMENTS THAT ESTABLISH MOVANT'S INTEREST IN THE SUBJECT PROPERTY. FOR PURPOSES OF EXAMPLE ONLY, THIS MAY BE A COMPLETE AND LEGIBLE COPY OF THE PROMISSORY NOTE OR OTHER DEBT INSTRUMENT TOGETHER WITH A COMPLETE AND LEGIBLE COPY OF THE MORTGAGE AND ANY ASSIGNMENTS IN THE CHAIN FROM THE ORIGINAL MORTGAGEE TO THE CURRENT MOVING PARTY. (EXHIBIT A.)
- (2) COPIES OF DOCUMENTS THAT ESTABLISH MOVANT'S STANDING TO BRING THIS MOTION. (EXHIBIT A.)
- (3) COPIES OF DOCUMENTS THAT ESTABLISH THAT MOVANT'S INTEREST IN THE REAL PROPERTY OR COOPERATIVE APARTMENT WAS PERFECTED. FOR THE PURPOSES OF EXAMPLE ONLY, THIS MAY BE A COMPLETE AND LEGIBLE COPY OF THE FINANCING STATEMENT (UCC-1) FILED WITH THE CLERK'S OFFICE OR THE REGISTER OF THE COUNTY IN WHICH THE PROPERTY OR COOPERATIVE APARTMENT IS LOCATED. (EXHIBIT A.)

DECLARATION AS TO BUSINESS RECORDS

I, Marinda Johnson, A DULY AUTHORIZED REPRESENTATIVE OF LITTON LOAN SERVICING, LP, THE MOVANT HEREIN, DECLARE PURSUANT TO 28 U.S.C. SECTION 1746 UNDER PENALTY OF PERJURY THAT THE INFORMATION PROVIDED IN THIS FORM AND ANY EXHIBITS ATTACHED HERETO (OTHER THAN THE TRANSACTIONAL DOCUMENTS ATTACHED AS REQUIRED BY PARAGRAPHS 1, 2, AND 3, ABOVE) IS DERIVED FROM RECORDS THAT WERE MADE AT OR NEAR THE TIME OF THE OCCURRENCE OF THE MATTERS SET FORTH BY, OR FROM INFORMATION TRANSMITTED BY, A PERSON WITH KNOWLEDGE OF THOSE MATTERS; THAT THE RECORDS WERE KEPT IN THE COURSE OF THE REGULARLY CONDUCTED ACTIVITY; AND THAT THE RECORDS WERE MADE IN THE COURSE OF THE REGULARLY CONDUCTED ACTIVITY AS A REGULAR PRACTICE.

I FURTHER DECLARE THAT COPIES OF ANY TRANSACTIONAL DOCUMENTS ATTACHED TO THIS FORM AS REQUIRED BY PARAGRAPHS 1, 2, AND 3, ABOVE, ARE TRUE AND CORRECT COPIES OF THE ORIGINAL DOCUMENTS.

EXECUTED AT Houston, TX
ON THIS 2nd DAY OF Dec, 2009

Marinda Johnson
Print Name Marinda Johnson
A Duly Authorized Representative
Litton Loan Servicing, LP
4828 Loop Central Drive
Houston, Texas 77081

DECLARATION

I, Marinda Johnson, A DULY AUTHORIZED REPRESENTATIVE OF LITTON LOAN SERVICING, LP, THE MOVANT HEREIN, DECLARE PURSUANT TO 28 U.S.C. SECTION 1746 UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT BASED ON PERSONAL KNOWLEDGE OF THE MOVANT'S BOOKS AND BUSINESS RECORDS.

EXECUTED AT Houston, TX
ON THIS 2nd DAY OF Dec, 2009

Marinda Johnson
Print Name Marinda Johnson
A Duly Authorized Representative
Litton Loan Servicing, LP
4828 Loop Central Drive
Houston, Texas 77081

5151-N-7254